

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

Autoscribe Corporation, §  
§  
*Plaintiff,* §  
§  
v. § Case No. 2:24-cv-00325-JRG  
§  
Nuvei Corporation, Nuvei Technologies § JURY TRIAL DEMANDED  
Corporation, Nuvei Limited, and Nuvei  
International Group Limited, §  
§  
*Defendants.* §  
§

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**JOINT CLAIM CONSTRUCTION AND PREHEARING STATEMENT**

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Pursuant to P.R. 4-3 and the Court’s Docket Control Order (Dkt. 26), Plaintiff Autoscribe Corporation (“Autoscribe”) and Defendants Nuvei Corporation, Nuvei Technologies Corporation, Nuvei Limited, and Nuvei International Group Limited (“Nuvei”) hereby submit their Joint Claim Construction and Prehearing Statement (“JCCS”).

The claim terms proposed for construction below are found within U.S. Patent No. 11,620,621 (the “‘621 patent”).

Pursuant to P.R. 4-3, the parties provide the following:

**I. P.R. 4-3(a)(1) – AGREED CLAIM CONSTRUCTIONS**

The parties have met and conferred in order to discuss limiting the number of asserted claims and disputed claim terms, which they have successfully done. At this time, the parties propose the following agreed constructions:

Claim Term	Agreed Construction
“Payment Amount” (Claims 15, 23, 25, and other dependent claims)	Plain and ordinary meaning

## **II. P.R. 4-3(a)(2) – DISPUTED CLAIM CONSTRUCTIONS**

The parties have identified the disputed claim terms and their corresponding proposed constructions in Exhibit A. Exhibit A also sets forth intrinsic and extrinsic evidence supporting the parties’ respective proposed constructions. The parties reserve the right to rely upon the evidence supplied by the opposing side. In addition, each party reserves the right to amend, correct, or supplement its claim construction positions and supporting evidence in response to any change of position by any other party, or for other good cause.

## **III. P.R. 4-3(a)(3) – LENGTH OF CLAIM CONSTRUCTION HEARING**

The Claim Construction Hearing is set to begin at 9:00 a.m. in Marshall, Texas before Judge Rodney Gilstrap on August 14, 2025. The parties propose that the Court allow a total of 3 hours (1.5 hours per side) for the hearing.

## **IV. P.R. 4-3(a)(4) – LIVE WITNESS TESTIMONY AT CLAIM CONSTRUCTION HEARING**

At this time, Plaintiff does not intend to call any live witnesses at the claim construction hearing.

At this time, Defendants do not intend to call any live witnesses at the claim construction hearing.

## **V. P.R. 4-3(a)(5) – OTHER ISSUES**

At this time, the parties are unaware of any other issues which might appropriately be taken up at a prehearing conference prior to the Claim Construction Hearing.

Dated: May 22, 2025

/s/ Jason McManis

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Respectfully submitted,

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